

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

)
) No. 03 MDL 1570 (GBD/FM)
) ECF Case
)

This document relates to:

CONTINENTAL CASUALTY CO., *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*,
Case No. 04-CV-05970

**DEFENDANT PEROUZ SEDAGHATY'S
ANSWER TO SECOND AMENDED COMPLAINT**

Defendant Perouz Sedaghaty ("Sedaghaty"), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits his Answer to Plaintiffs' Second Amended Complaint ("Complaint").

Background

1. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

Jurisdiction and Venue

2. Sedaghaty denies that this court has subject matter jurisdiction over AHIF-USA under 18 U.S.C. § 1961 (RICO), because this Court has dismissed all RICO claims against him. Sedaghaty denies that this court has subject matter jurisdiction over plaintiffs' claims under 28 U.S.C. §§ 1330(a) and 1605, because those provisions apply solely to actions against foreign states.

3. Sedaghaty denies that venue is proper under 49 U.S.C. § 40101 or 28 U.S.C. § 1391(b)(2). Sedaghaty denies that venue is proper under 28 U.S.C. § 1391(f)(1), because those provisions apply solely to actions against foreign states.

4. Sedaghaty denies that venue is proper under 28 U.S.C. § 1605, because those provisions apply solely to actions against foreign states.

Parties

5. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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Summary of Allegations

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209. Sedaghaty denies the allegations in this paragraph insofar as they refer to the Al Haramain Islamic Foundation, Inc. (USA) ("AHIF-USA"). Sedaghaty does not possess

sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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493. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

494. Sedaghaty denies that AHIF-USA is “controlled primarily from al-Haramain’s headquarters in Riyadh, Saudi Arabia,” or that it has “been exposed for providing direct and material support to al Qaeda.” Sedaghaty admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of AHIF-USA. Sedaghaty admits that the United States government has designated two groups in Bosnia and Somalia affiliated with al-Haramain (Saudi Arabia) as terrorist entities. Sedaghaty denies all other allegations in paragraph 494 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

495. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

496. Sedaghaty admits that AHIF-USA is incorporated and registered to do business in Oregon. Sedaghaty denies the remaining allegations in paragraph 496 insofar as they refer to AHIF-USA, Soliman H.S. al-Buthe, or Perouz Seda Ghaty. Sedaghaty does not possess

sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

497. Sedaghaty denies the allegations in paragraph 497 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

498. Sedaghaty denies the allegations in paragraph 498 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

499. Sedaghaty denies the allegations in paragraph 499 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

500. Sedaghaty admits that the United States government has designated two groups in Bosnia and Somalia affiliated with al-Haramain (Saudi Arabia) as terrorist entities. Sedaghaty denies all other allegations in paragraph 500 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

501. Sedaghaty denies the allegations in paragraph 501 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

502. Sedaghaty denies the allegations in paragraph 502 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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504. Sedaghaty denies the allegations in paragraph 504 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

505. Sedaghaty denies the allegations in paragraph 505 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

506. Sedaghaty denies the allegations in paragraph 506 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

507. Sedaghaty denies the allegations in paragraph 507 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

508. Sedaghaty denies the allegations in paragraph 508 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

509. Sedaghaty denies the allegations in paragraph 509 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

510. Sedaghaty denies the allegations in paragraph 510 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

511. Sedaghaty denies the allegations in paragraph 511 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

512. Sedaghaty denies that AHIF-USA is a business entity of al-Haramain (Saudi Arabia), and avers that “al-Haramain [sic] Foundation” and the “al-Haramain [sic] Islamic Foundation” are assumed business names of AHIF-USA under Oregon law, and denies that they are business entities of al-Haramain (Saudi Arabia). Sedaghaty denies that AHIF-USA, al-Haramain [sic] Foundation, or al-Haramain [sic] Islamic Foundation, are one and the same as al-Haramain’s office in Riyadh, Saudi Arabia. Sedaghaty admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of AHIF-USA. Sedaghaty denies the remaining allegations in paragraph 512, including that he is specifically linked to al Qaeda operations.

513. Sedaghaty denies that AHIF-USA’s Year 2000 Form 990 states that “it operates an Islamic center in Springfield, Missouri;” instead, its Year 2000 Form 990 states that “Prayer houses are located in Ashland, Ore. and Springfield, Mo.,” and the Springfield prayer house is operated by a separate group. Sedaghaty denies that the property in Springfield, Missouri is owned by al-Haramain (Saudi Arabia). Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in paragraph 513, to the extent an additional response is required.

514. Sedaghaty denies the allegations in paragraph 514 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

515. Sedaghaty denies the allegations in paragraph 515 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other

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516. Sedaghaty denies the allegations in paragraph 516 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

517. Sedaghaty denies the allegations in paragraph 517 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

518. Sedaghaty denies the allegations in paragraph 518 insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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the allegations contained in this paragraph.

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599. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

CLAIMS

Count One — Property Damage (Trespass)

600. AHIF-USA hereby incorporates its responses to the previous allegations as if fully set forth herein.

601. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

602. No response is required to the allegations in this paragraph because the conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

603. No response is required to the allegations in this paragraph because the conspiracy

cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

604. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

605. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

606. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Count Two — RICO

607. AHIF-USA hereby incorporates its responses to the previous allegations as if fully set forth herein.

608. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

609. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

610. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which

no response is required. To the extent a response is required, the allegations are denied.

611. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

612. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

613. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Count Three — RICO

614. AHIF-USA hereby incorporates its responses to the previous allegations as if fully set forth herein.

615. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

616. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which

no response is required. To the extent a response is required, the allegations are denied.

617. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Prayer for Relief

(1) The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

(2) The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

(3) The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

(4) The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Each and every allegation in plaintiffs' complaint that has not been specifically admitted is hereby denied.

(First) Addendum to Second Amended Complaint (page 175)

A. Al Rajhi Banking & Investment Corporation.

These allegations appear to relate to defendants other than Sedaghaty. AHIF-USA denies the allegations in this paragraph insofar as they refer to him. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

(Second) Addendum to Second Amended Complaint (pages 176-221)

A. Al Rajhi Banking & Investment Corporation.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to him. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

B. Sulaiman Al Rajhi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

C. Saleh Al Rajhi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

D. Abdullah Al Rajhi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

E. Sheikh Abdul Aziz Al Ibrahim.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

F. World Assembly of Muslim Youth.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

G. The Abdul Aziz Al Ibrahim Foundation.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

H. Saleh Kamel (et al.).

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess

sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

(Third) Addendum to Second Amended Complaint (pages 222-269)

See Response to (Second) Addendum to Second Amended Complaint, *supra*.

(Fourth) Addendum to Second Amended Complaint (pages 270-424)

A. Al Rajhi Banking & Investment Corporation.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

B. Sulaiman Al Rajhi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

C. Saleh Al Rajhi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

D. Abdullah Al Rajhi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

E. Sheikh Abdul Aziz Al Ibrahim.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

F. World Assembly of Muslim Youth.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

G. The Abdul Aziz Al Ibrahim Foundation.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

H. Saleh Kamel (et al.).

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this

paragraph.

I. Yeslam Bin Ladin.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

J. Al Barakaat (et al.).

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

K. Al Shamal Islamic Bank.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

L. Omar al-Bayoumi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

M. Mamoun Darkanzali.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies

the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

N. (no defendant listed herein)

O. Global Relief Foundation.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

P. Bank Al Taqwa (et al.)

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

Q. Islamic African Relief Agency.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

R. Benevolence International Foundation.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this

paragraph.

S. Yassin Abdullah al-Qadi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

T. Wafa Humanitarian Organization.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

(no letter) Tadamon Islamic Bank.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

U. Al Haramain Islamic Foundation.

Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

V. SAAR Network Executives.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess

sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

W. Asat Trust.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

X. Dar Al Maal Al Islami Trust.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

Y. Saudi Bin Laden Group.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

Z. Bakr Bin Laden.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

AA. Abdullah & Omar Bin Laden.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

BB. Tarek Bin Laden.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

CC. Mohammed Bin Laden Organization.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

DD. Prince Naif.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

EE. Rabita Trust.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this

paragraph.

FF. Prince Abdullah (et al.).

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

GG. Abdulrahman Alamoudi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

HH. Prince Mohamed.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

II. African Muslim Agency (et al.).

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

JJ. Mar-Jac Poultry, Inc.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies

the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

KK. Saudi Red Crescent Society and Dr. Abdul Rahman Al Swailem.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

LL. Adnan Basha.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

MM. Shahir A. Batterjee.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

NN. Dr. Abdullah bin Mohsen Al Turki.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

OO. International Islamic Relief Organization.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

PP. Saudi Joint Relief Committee for Kosovo and Chechnya.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

QQ. Wael Julaidain.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

RR. Tarik Hamdi.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

SS. Saudi High Commission for Relief to Bosnia and Herzegovina.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess

sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

TT. Prince Salman.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

UU. National Commercial Bank.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

VV. Prince Sultan.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

WW. (no defendant listed)

XX. Soliman Al-Buthe.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

YY. Faisal Islamic Bank – Sudan.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

(YY) Khalid Bin Mahfouz.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

ZZ. Dubai Islamic Bank.

These allegations appear to relate to defendants other than Sedaghaty. Sedaghaty denies the allegations in this paragraph insofar as they refer to him. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against Sedaghaty for which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

(Causation)

There is no causal connection between any of Sedaghaty's activities and plaintiffs'

injuries.

THIRD AFFIRMATIVE DEFENSE

(Causation)

No act or omission of any agent, servant, or employee of Sedaghaty proximately caused any harm or damage to plaintiffs.

FOURTH AFFIRMATIVE DEFENSE

(Causation)

Sedaghaty's activities were not the proximate cause of any harm or damage to plaintiffs.

FIFTH AFFIRMATIVE DEFENSE

(Scienter)

Plaintiffs fail to adequately allege scienter on Sedaghaty's part.

SIXTH AFFIRMATIVE DEFENSE

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

SEVENTH AFFIRMATIVE DEFENSE

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against Sedaghaty.

EIGHTH AFFIRMATIVE DEFENSE

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against Sedaghaty.

NINTH AFFIRMATIVE DEFENSE

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against Sedaghaty.

TENTH AFFIRMATIVE DEFENSE

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against Sedaghaty.

ELEVENTH AFFIRMATIVE DEFENSE

(Statute of Limitations)

Plaintiffs' claims against Sedaghaty are barred, in whole or in part, by the applicable statute of limitation(s).

TWELFTH AFFIRMATIVE DEFENSE

(Punitive Damages)

Plaintiffs' claims for punitive damages against Sedaghaty are barred because Sedaghaty's activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous

conduct aggravated by evil motive, or reckless indifference, and none of Sedaghaty's activities in any way were intended to, or did harm, the plaintiffs in this action.

THIRTEENTH AFFIRMATIVE DEFENSE

(Joint or Several Liability)

Defendant is not liable for plaintiffs' damages based on the doctrines of several liability and/or combined or comparative fault, under N.Y. C.P.L.R. § 1601 *et seq.*

FOURTEENTH AFFIRMATIVE DEFENSE

(No Double Recovery)

Plaintiffs have waived their claims based on the doctrine disallowing double recovery and/or the doctrine of election of remedies.

FIFTEENTH AFFIRMATIVE DEFENSE

(Collateral Source)

Plaintiffs have waived their claims based on the collateral source doctrine.

SIXTEENTH AFFIRMATIVE DEFENSE

(Subrogation)

Plaintiffs have waived their claims based on the doctrine of subrogation and/or the doctrine of equitable subrogation.

SEVENTEENTH AFFIRMATIVE DEFENSE

In response to plaintiffs' claims, Sedaghaty intends to invoke any other defenses, including affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses.

Sedaghaty requests that the Plaintiffs' First Amended Complaint be dismissed with prejudice as to him, and that the Court award attorney's fees and costs to Sedaghaty in defending against a case with no factual or legal basis against him, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

/s/ Lynne Bernabei

Lynne Bernabei D.C. Bar No. 938936
Alan R. Kabat D.C. Bar No. 464258
Bernabei & Wachtel, PLLC
1775 T Street, N.W.
Washington, D.C. 20009
(202) 745-1942

Attorneys for Defendant
Perouz Sedaghaty

Dated: October 15, 2010

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2010, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004).

/s/ Alan R. Kabat

Alan R. Kabat